

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

United States District Court
Southern District of Texas
FILED

CRIMINAL COMPLAINT

Lorena Perez
A208 165 819
United States CitizenPRINCIPAL
YOB: 1992

Case Number:

M-15-0681-M

APR 29 2015

Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about April 27, 2015 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact Reina Yamileth Gaitan-Martinez and Franci Esmilda Maldonado-Ramos, both citizens of Honduras, along with seven (7) other undocumented aliens, for a total of nine (9), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near La Joya, Texas to the point of arrest near La Joya, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On April 27, 2015, DPS Trooper R. Conkling stopped a green Ford Explorer in La Joya, Texas, for no seat belt on a rear seat passenger. Trooper Conkling stated he was able to see the seat buckle shining in the sunlight, unbuckled. After stopping the vehicle, Trooper Conkling suspected the vehicle contained illegal aliens, and requested assistance from Border Patrol.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved by Daniel A. Lindemann

D. A. Lindemann 4/29/15

Signature of Complainant

Sworn to before me and subscribed in my presence,

Francisco Sanchez Senior Patrol Agent
Printed Name of ComplainantApril 29, 2015
Date

9:02 am

at McAllen, Texas
City and StatePeter E. Ormsby U. S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-15-0681-M

RE: Lorena Perez

A208 165 819

CONTINUATION:

Agent O'Rand responded to Conkling and determined the driver, identified as Lorena PEREZ, was a United States citizen. The 9 passengers she was carrying, all claimed to be illegally in the United States.

All 10 people were transported to the McAllen Border Patrol Station for processing.

PRINCIPAL'S STATEMENT:

Lorena PEREZ was read her rights. She stated she was willing to provide a statement without the presence of an attorney.

PEREZ told agents she picked up the illegal aliens on FM 2221, North of the La Joya area. She stated she knew it was illegal to transport illegal aliens, however she needed the money, and was going to be paid \$300 per person she transported to Donna, Texas. According to PEREZ, she only speaks to the person who hired her when she needs money.

MATERIAL WITNESSES' STATEMENTS:

Both material witnesses were read their rights. Both stated they were willing to provide statements without the presence of an attorney.

1- Reina Yamileth Gaitan-Martinez, a citizen of Honduras, told agents she was charged \$4,000 (USD) to be smuggled to New York. After illegally crossing the Rio Grande River, Gaitan was told a little fat man would be waiting for them. The group walked to the side of the road, and the vehicle was there waiting for them. Gaitan and the group then boarded the truck, driven by someone she described as a man wearing a blue shirt and had tattoos. Gaitan identified Lorena PEREZ in a photo lineup as the person she referred to as the man driving the truck that picked her up.

2- Franci Esmilda Maldonado-Ramos, a citizen of Honduras, claimed she was charged 2,000 (USD) to be smuggled to Houston, Texas. After illegally crossing the Rio Grande River, the foot guide told her and the group to wait by the road for the vehicle to pick them up. The vehicle arrived and they boarded it. According to Maldonado, she thought the driver was taking them to some place in McAllen. Maldonado described the driver as fat, bald, and wearing a blue shirt. She identified Lorena PEREZ in a photo lineup as the driver.